

# Mrs Robinson - PRIVACY POLICY

## 1. Introduction

We are **Mrs Robinson Management LTD.** (“we” or “us”), a company registered in England and Wales.

Our company registration number is 8693927 and our registered address is at **27 Mortimer Street, London, W1T 3BL.** Our registered VAT number is 171521824

We are committed to protecting your **personal data.** This privacy policy gives you detailed information on when and why we collect your **personal data,** how we use it and how we keep it secure. Please read this policy carefully alongside any applicable **Terms & Conditions** to understand our views and practices regarding your **personal data** and how we will treat it.

More information can be provided on request. Definitions, and words in **bold type,** are defined in the **Appendix** at the end of this privacy policy unless otherwise disclosed.

## 2. Our Responsibilities

For the purpose of the applicable **Data Protection Legislation,** we are the **data controller** of any personal data we **process.** As a **data controller,** we are responsible for ensuring our systems, processes, suppliers and **People** comply with **Data Protection Legislation** in relation to the **personal data** we handle.

We require our **People** to comply with this privacy policy **Data Protection Policy** when dealing with **personal data.**

We take **Personal Data Breaches** very seriously, and are required to notify the Information Commissioner’s Office in the event of such a breach.

When using, collecting and disclosing **personal data,** we follow the key data protection **principles.**

We have policies, procedures and records to demonstrate compliance with the **principles,** as further detailed in our **Data Protection Policy.**

## 3. The Information We Collect

Generally, we collect your **personal data** when you interact with us (for example, when entering into a relationship with us as **Talent,** a **Client** or one of our **People**). However, from time to time we also need to collect personal data from other **third parties** in connection with our relationship with you. We also look at how our users access and use our **Website,** so we can offer the best possible experience. The following table summarises how we collect, use and disclose your personal data:

### Talent (Including Prospective Talent)

Types of Personal Data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as:</p> <ul style="list-style-type: none"> <li>• your name, address, contact details, education and employment history;</li> <li>• identification documentation;</li> <li>• right to work status;</li> <li>• information relating to next of kin/ dependants;</li> <li>• financial information including bank details and identifiers (e.g. National Insurance numbers);</li> <li>• images/photographs of you; and</li> <li>• reviews/feedback relating to your ability as/to become <b>Talent</b>.</li> </ul> <p>We may also process <b>sensitive personal data</b> such as health details, medical details, your gender and racial origin.</p>	<p>Your personal data will be collected from various sources including:</p> <ul style="list-style-type: none"> <li>• your application form/CV;</li> <li>• <b>when you contact us via email or telephone;</b></li> <li>• providers of background checks;</li> <li>• notes and records kept for the duration of your engagement with us as Talent (including details of any complaints, breaches of the terms of your contract with us, and meetings with us regarding our relationship and your engagement as Talent);</li> <li>• providers of health services (where we refer you to such services pursuant to the terms of your contract with us;</li> <li>• CCTV while on our premises;</li> <li>• from our Clients (including reviews/feedback, and images and photographs); and</li> <li>• publicly available sources such as magazines, press articles, documentaries and social media.</li> </ul>	<p>Your <b>personal data</b> will be used for the following purposes:</p> <ul style="list-style-type: none"> <li>• internal administration and management purposes;</li> <li>• assessing suitability/eligibility and/or fitness as <b>Talent</b>;</li> <li>• fulfilling our contractual obligations to you;</li> <li>• fulfilling our contractual obligations to our <b>Clients</b>; and</li> <li>• fulfilling our legal obligations.</li> </ul> <p>Photographs and images of you, and your name, employment history, education, and reviews and feedback relating to your ability as <b>Talent</b>, may be used in our marketing and promotional material including our <b>Website</b> and pitches to <b>Clients</b>.</p>	<p>Your <b>personal data</b> may be transferred to:</p> <ul style="list-style-type: none"> <li>• our <b>third party</b> service providers who support the operation of our business;</li> <li>• our <b>Clients</b>, for the purposes of fulfilling our contractual obligations;</li> <li>• our <b>Affiliate Talent Agencies</b>;</li> <li>• other <b>third parties</b> such as our legal and other professional advisers and government departments.</li> </ul> <p>We shall only transfer personal data to <b>third parties</b> which is limited to the relevant <b>purpose</b> and is adequately protected.</p>	<p><b>Talent personal data</b> shall be kept for up to <b>20 years</b> after you have left Mrs Robinson and we shall not keep your <b>personal data</b> for longer than is necessary.</p> <p>We will ensure we keep all <b>personal data</b> up to date and shall immediately and permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

**Clients (Including Prospective Clients)**

Types of Personal Data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as your:</p> <ul style="list-style-type: none"> <li>• name and business information;</li> <li>• identification documentation;</li> <li>and</li> <li>• payment details.</li> </ul>	<p>Your <b>personal data</b> will be collected for relationship management and file opening is collected from you directly and further information (e.g. to verify your identity) may be collected from <b>third parties</b>, such as publicly available sources.</p> <p><b>When you contact us via email or telephone, we may collect any personal data you provide you provide to us.</b></p> <p>All additional personal data is collected when supplied to us, or created by us in connection with a particular matter on which we are engaged.</p>	<p>Your <b>personal data</b> will be used for relationship management and file opening data is used for providing legal services, administration, commercial purposes (e.g. creditworthiness) and as required by law (e.g. anti money laundering).</p> <p>All other personal data will be used for the purposes of providing legal services and to comply with our statutory/ regulatory obligations.</p>	<p>Your <b>personal data</b> may be disclosed to:</p> <ul style="list-style-type: none"> <li>• our <b>third party</b> service providers who support the operation of our business;</li> <li>• our <b>Talent</b>, for the purposes of fulfilling our contractual obligations;</li> <li>and</li> <li>• our <b>Affiliate Talent Agencies</b>.</li> </ul> <p>We shall only transfer personal data to <b>third parties</b> which is limited to the relevant <b>purpose</b> and is adequately protected.</p>	<p><b>Client personal data</b> shall be kept for up to <b>5 years</b> and we shall not keep your <b>personal data</b> for longer than is necessary.</p> <p>We will ensure we keep all personal data up to date and shall immediately and <b>permanently delete</b> any personal data which is not necessary for the <b>purpose</b>.</p>

### Subscribers to Our Promotional Material

Types of Personal Data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as your name and business information (email address, job title, who you work for). Additional information may be <b>processed</b> where it is provided by you, for example in correspondence, in connection with any <b>Talent</b>, or in letting us know your interests and how/when you wish to be contacted by us</p>	<p>Your <b>personal data</b> is collected when you register or ‘opt in’ to receive:</p> <ul style="list-style-type: none"> <li>•marketing/promotional material;</li> <li>• information and updates about our <b>Talent</b>;</li> <li>and</li> <li>• details of events.</li> </ul> <p>You can contact us at any time to amend your preferences or opt out of communications from us. You will also be sent the option to opt out of future communications in every communication you receive from us.</p>	<p>Where you have given us your clear, unambiguous consent to do so, your <b>personal data</b> will be used to:</p> <ul style="list-style-type: none"> <li>• contact you about, and provide you with, the communications we think are relevant to your interests and preferences; and</li> <li>• understand our subscribers’ preferences and interests so we may improve our services, communication and marketing material.</li> </ul>	<p>Your <b>personal data</b> may be transferred to our <b>third party</b> service providers who support the operation of our business.</p> <p>Where you have given us your clear, unambiguous <b>consent</b> to do so, we may pass your <b>personal data</b> to selected <b>third parties</b> to provide you with information about services we feel may interest you.</p> <p>We shall only transfer personal data to <b>third parties</b> which is limited to the relevant <b>purpose</b> and is adequately protected.</p>	<p>Subscriber <b>personal data</b> shall be kept for up to <b>5 years</b> and we shall not keep your <b>personal data</b> for longer than is necessary.</p> <p>We will ensure we keep all <b>personal data</b> up to date and shall immediately and permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

## Users of Our Website

Types of Personal Data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as:</p> <ul style="list-style-type: none"> <li>• technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, type of device used to access our <b>Website</b> and the location of where you access our <b>Website</b> via a mobile device;</li> <li>• information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our <b>Website</b> (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number; and</li> <li>• your name and email address/other contact details.</li> </ul>	<p>Your <b>personal data</b> is collected when you:</p> <ul style="list-style-type: none"> <li>• use our <b>Website</b> (e.g. browsing, searching);</li> <li>• provide us with personal information to enable us to contact you and let us know of your marketing preferences; and</li> <li>• <b>contact us via email.</b></li> </ul>	<p>Your personal information is used to:</p> <ul style="list-style-type: none"> <li>• tailor and enhance your user experience;</li> <li>• improve the functionality of our <b>Website</b>;</li> <li>• ensure our <b>Website</b> caters to our users' preferences;</li> <li>• contact you about, and provide you with, the communications we think are relevant to your interests and preference; and</li> <li>• contact you and provide you with information about our services.</li> </ul>	<p>Your <b>personal data</b> may be transferred to our <b>third party</b> service providers who support the operation of our business. Where you have given us your clear, unambiguous <b>consent</b> to do so, we may pass your <b>personal data</b> to selected <b>third parties</b> to provide you with information about services we feel may interest you.</p> <p>We shall only transfer personal data to third parties which is limited to the relevant purpose and is adequately protected.</p>	<p>Our <b>Website</b> users' <b>personal data</b> shall be kept for <b>1 year</b> and we shall not keep your <b>personal data</b> for longer than is necessary. We will ensure we keep all personal data up to date and shall immediately and permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

<b>Our People</b>				
<b>Types of Data</b>	<b>Collection</b>	<b>Purpose</b>	<b>Disclosure</b>	<b>Retention Period</b>
<p><b>Personal data</b> such as:</p> <ul style="list-style-type: none"> <li>• your name, address, contact details, education and employment history;</li> <li>• background checks (financial and criminal);</li> <li>• identification documentation;</li> <li>• right to work status;</li> <li>• information relating to next of kin/ dependants; and</li> <li>• financial information including bank details and identifiers (e.g. National Insurance numbers).</li> </ul> <p>We may also process <b>sensitive personal data</b> such as health details, racial origin, religious beliefs and information about offences/ alleged offences.</p>	<p>Your <b>personal data</b> will be collected from various sources including:</p> <ul style="list-style-type: none"> <li>• your application form/CV;</li> <li>• providers of background checks;</li> <li>• notes and records kept for the duration of your employment (including absences, appraisals, disciplinary action);</li> <li>• providers of occupation health services; and</li> <li>• CCTV and security access devices.</li> </ul>	<p>Your <b>personal data</b> will be used for the following <b>purposes</b>:</p> <ul style="list-style-type: none"> <li>• human resources administration;</li> <li>• assessing suitability/eligibility and/or fitness to work;</li> <li>• security; and</li> <li>• training.</li> </ul> <p>Photographs and images of you, your name, and information about your education and employment may be used in our marketing and promotional material including our <b>Website</b> and pitches to <b>Clients</b>.</p>	<p>Your <b>personal data</b> may be transferred to</p> <ul style="list-style-type: none"> <li>• our <b>third party</b> service providers who support the operation of our business;</li> <li>• our <b>Clients</b>, for the purposes of fulfilling our contractual obligations; and</li> <li>• Our <b>Affiliate Talent Agencies</b>.</li> </ul> <p>We shall only transfer <b>personal data</b> to <b>third parties</b> which has been limited to the relevant <b>purpose</b>.</p>	<p>Our <b>People’s personal data</b> shall be kept for up to <b>5 years</b> after you have left the Company and we shall not keep your <b>personal data</b> for longer than is necessary.</p> <p>We will ensure we keep all <b>personal data</b> up to date and shall immediately and permanently delete any <b>personal data</b> which is not necessary for the <b>purpose</b>.</p>

#### **4. Use of Your Information Outside The European Economic Area ("EEA")**

The European Economic Area or "EEA" is deemed to have good standards when it comes to **data privacy**. As such, we consciously limit the occasions when we may need to transfer or handle your **personal data** outside of the EEA. Where we do, for example where our service providers are based outside of the EEA, we make sure that your **personal data** is still treated fairly and lawfully in all respects (including making sure we have a legal ground for sending your **personal data** outside the EEA and putting in place all necessary safeguards for such arrangement).

Where relevant, you will have the right to see a copy of any safeguards we put in place for international transfers of your data. Just get in touch with us if you would like to find out more

#### **5. Your rights**

**Personal data** must be processed in line with an individual's rights, including the right to: request a copy of their **personal data**;

request that their inaccurate **personal data** is corrected;

request that their **personal data** is deleted and destroyed when causing damage or distress; and opt out of receiving electronic communications from us.

Should you wish to make a request in line with your rights as an individual, please forward it to us using the contact details provided at the end of this privacy policy.

Our **People** must notify or inform Rebi Merilion immediately if they receive a request in relation to **personal data** which the firm processes.

The **Data Protection Legislation** gives you the right to access information held about you. Your right of access can be exercised in accordance with the **Data Protection Legislation** (as applicable).

#### **6. Security**

Information security is a key element of data protection. We take appropriate measures to secure **personal data** and protect it from loss or unauthorised disclosure or damage. Our policy and approach to information security is contained within our **Data Protection Policy**.

#### **7. Cookies**

We use tracking technologies, including cookies, on our **website**. A cookie is a very small file sent to your web browser by a website's server to process information more efficiently and allow the server to uniquely identify the browser on each page.

Cookies and other similar technologies distinguish you from other users of our **website** and may: 1) be fundamental to the running of our **website**; 2) help our **website** to perform effectively; 3) enable us to understand our customers' browsing behaviour; and/or 4) allow us to improve our **website**. We use the following categories of cookies on our **website**:

- **Strictly necessary cookies**. These are cookies that are required for the operation of our **website**. They include, for example, cookies that enable you to log into secure areas of our website.

- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our **website** when they are using it. This helps us to improve the way our **website** works.

Importantly, we will not use any cookies or similar technologies (or permit any **third parties** to place these on our website) which are not strictly necessary for the operation of our website, without first getting your consent. You can manage your settings and block cookies/tracking technologies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our website.

## **8. Changes to our privacy policy**

Any changes we may make to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **9. Your Choice**

You may choose to stop receiving communications from us at any time. To do this, to access your personal information or to ask us to remove your personal information from our database, please send a message with your request to the policy manager Rebi Merilion at: [MrsRobinson@MrsRobinsonManagement.Co.Uk](mailto:MrsRobinson@MrsRobinsonManagement.Co.Uk)

## **10. Questions and Contacting Us**

If you have any comments, questions or suggestions relating to our use of your information, the information collected or your use of our website please contact the **policy manager** Rebi Merilion at: [MrsRobinson@MrsRobinsonManagement.Co.Uk](mailto:MrsRobinson@MrsRobinsonManagement.Co.Uk)



## Appendix

**Affiliate Talent Agencies:** model and/or talent agencies in jurisdictions outside of the UK who have either:

(a) Engaged us to provide modelling and/or talent agency services on their behalf in the UK.;

OR

(b) Been engaged by us to provide modelling and/or talent agency services on our behalf in a jurisdiction outside of the UK.

**Clients:** any person, business or other organisation who engages, or is looking to engage, the services of our **Talent**.

**Controller:** a personal/organisation who determines the **purpose** for which, and the manner in which, any **personal data** is processed.

**Data Protection Policy:** our internal data protection policy which sets out how we keep **personal data** secure, including technical measures (e.g. encryption of **personal data**, restricted access to **personal data**, monitoring and testing systems for unauthorised access, backups of **personal data**), roles and responsibilities of individuals and the scope of protection.

**People:** all people providing services to or working for us, including but not limited to our employees, directors, members, and contractors.

**Personal data:** information (including opinions) which relates to an individual and from which he or she can be identified either directly or indirectly through other data which we have or are likely to have in our possession. These individuals are sometimes referred to as **data subjects**.

**Personal Data Breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, **personal data** transmitted, stored or otherwise **processed** by an organisation electronically. A **personal data breach** may mean someone outside the organisation gets unauthorised access to **personal data**, but a breach can occur if there is unauthorised access within the organisation or if an employee accidentally alters or deletes **personal data**.

**Principles:** the core data protection principles underlying the Data Protection Legislation, which specify **personal data** should be: processed lawfully, fairly and in a transparent manner; collected for specified, explicit and legitimate **purposes**; adequate, relevant and limited to what is necessary; accurate and, where necessary, kept up to date; kept for no longer than is necessary; processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Additionally, organisations must adhere to the principal of accountability.

**Process:** the ‘processing’ of **personal data** captures a wide range of activities, and includes obtaining, recording and holding **personal data** and performing any operation of the **personal data** (including erasure/destruction).

**Processor:** any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

**Purpose:** the purposes identified in the “**Purpose**” column of the tables in section 3 of this privacy policy (How we collect, use and disclose your **personal data**), as applicable.

**Talent:** models and/or other talent who have engaged, or are looking to engage, our modelling and/or talent agency services and are or are considering being, represented by us.

### Terms and Conditions:

**Third party:** a person, organisation or other body other than the **data subject, controller, processor** and persons who, under the direct authority of the **controller** or **processor**, are authorised to process **personal data**.

**Website:** [www.mrsrobinsonmanagement.co.uk](http://www.mrsrobinsonmanagement.co.uk)

**Web Beacon:** A **Web beacon** is an often-transparent graphic image, usually no larger than 1 pixel x 1 pixel, that is placed on a **website** or in an email that is used to monitor the behavior of the user visiting the **website** or sending the email. It is often used in combination with cookies.

**Web Bug:** A **Web bug**, also known as a **Web beacon**, is a file object that is placed on a Web page or in an e-mail message to monitor user behaviour. Unlike a cookie, which can be accepted or declined by a browser user, a **Web bug** arrives as just another GIF or other file object.